

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' FIFTY-FIFTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN DUPLICATE
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the fifty-fifth omnibus objection (the "Objection")² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the "Debtors"), for entry of an order (this "Order") sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or

causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Duplicate Portal Claims

FTX Trading Ltd. 22-11068 (JTD)
Fifty-Fifth Omnibus Claims Objection
Schedule 1 - Substantive Duplicate Claims

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
72705	Name on file	FTX Trading Ltd.	ETHW FTT USD	1,656.8350000000000000 156.7937153700000000 1,306,691.3000000000000000	43906*	Name on file	FTX Trading Ltd.	ALGO-PERP ANC-PERP APE-PERP APT-PERP AUDIO-PERP AVAX-PERP BAND-PERP BNB-PERP BTC-PERP C98-PERP CEL-PERP CHZ-PERP CRV-PERP CVX-PERP DOGE-PERP DOT-PERP ENS-PERP EOS-PERP ETC-PERP ETH-PERP ETHW ETHW-PERP FLM-PERP FTM-PERP FTT FTT-PERP FKS-PERP GAL-PERP GLMR-PERP GMT-PERP GST-PERP HT-PERP KNC-PERP LDO-PERP LOOKS-PERP LUNC-PERP MASK-PERP MATIC-PERP MTL-PERP NEAR-PERP ONE-PERP OP-PERP PROM-PERP PUNDIX-PERP RAY-PERP REEF-PERP RNDR-PERP ROSE-PERP SAND-PERP SLP-PERP SOL-PERP STORJ-PERP TRX-PERP USD USTC-PERP WAVES-PERP ZIL-PERP	0.0000000000000000 0.0000000000000000 0.0000000000000000 -10,000.0000000000000000 0.0000000000000000 0.0000000000000000 -14,994.1000000000000000 0.0000000000000000 -0.0000000000000001 0.0000000000000000 0.00000000033651 0.0000000000000000 0.0000000000000000 0.00000000002728 0.0000000000000000 0.0000000000000000 0.0000000000000000 0.0000000000000000 -0.0000000000000028 -0.0000000000000171 1,656.8350000000000000 0.0000000000000000 494,974.0000000000000000 0.0000000000000000 156.7937153700000000 0.0000000000000000 0.0000000000000000 -0.000000000000185 0.0000000000000000 0.0000000000000000 0.0000000000000000 -6,889.3600000000000000 -0.00000000005912 0.0000000000000000 0.0000000000000000 0.0000000000000000 -250,000.0000000000000000 -0.00000000007276 0.0000000000000000 0.0000000000000000 -0.0000000000000071 0.0000000000000000 0.0000000000000000 0.0000000000000000 0.0000000000000000 -16,000.0000000000000000 0.0000000000000000 0.0000000000000000 1,306,691.2967196800000000 0.0000000000000000 0.0000000000000000 0.0000000000000000

Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).

90878	Name on file	FTX Trading Ltd.	ATOM ETH ETHW FTT LUNA2 MATIC SAND STARS USD	298,241.9300000000000000 254,766.1500000000000000 3,184.1100000000000000 1,080.8300000000000000 366.4800000000000000 199,674.9000000000000000 67,018.3000000000000000 975.6000000000000000 445,504.3200000000000000	46220*	Name on file	FTX Trading Ltd.	ALT-PERP ASD ATOM ATOM-PERP AVAX AVAX-PERP BCH-PERP BTC BTC-MOVE-20210827 BTC-MOVE-20210828 BTC-MOVE-20210829 BTC-MOVE-20210901 BTC-MOVE-20210909 BTC-MOVE-20210910 BTC-PERP ETC-PERP ETH ETH-PERP ETHW FTT FTT-PERP LUNA2 LUNA2_LOCKED LUNC-PERP MATIC		0.0000000000000032 0.0000000050000000 298,241.9300000000000000 0.0000000000000000 0.00000001643058 0.0000000000000000 0.0000000000000000 0.0000000082500000 -0.000000000000015 0.000000000000028 0.0000000000000000 0.0000000000000000 0.0000000000000003 0.0000000000000001 0.0000000000000001 0.0000000000000000 254,766.1500000000000000 -0.000000000000092 3,184.1100000000000000 1,080.8300000000000000 0.0000000000000000 366.4800000000000000 331.5070516590000000 0.0000000000000000 199,674.9000000000000000	
-------	--------------	------------------	--	---	--------	--------------	------------------	---	--	---	--

43906*: Surviving Claim was ordered modified on the Debtors' Twelfth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

46220*: Surviving Claim was adjourned on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
								MID-PERP	0.000000000000024
								SAND	67,018.300000000000000
								SAND-PERP	0.000000000000000
								SHIT-PERP	0.000000000000000
								STARS	28,953.760700000000000
								TRX	0.000001000000000
								USD	359,541.625475050240000
								USDT	445,504.320000000000000
								USTC-PERP	0.000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which was adjudged on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									
94649	Name on file	FTX Trading Ltd.	BNB	17,000.000000000000000	88974*	Name on file	FTX Trading Ltd.	BNB	0.000000000000000
			USD	17,000.000000000000000				BTC	5,000.000000000000000
			USDT	17,000.000000000000000				USD	5,000.000000000000000
								USDT	5,000.000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Thirty-Sixth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									
1999	Name on file	FTX Trading Ltd.	USD	12,979,273.350000000000000	1998*	Name on file	FTX Trading Ltd.	USD	12,979,273.350000000000000
Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.									
54026	Name on file	FTX Trading Ltd.	ETH	600.388179240000000	54004*	Name on file	FTX EU Ltd.	ETH	600.388179240000000
			TRX	11.000000000000000				TRX	11.000000000000000
Reason: The Claimant has filed multiple proofs of claim and conducted a transfer of their earliest filed claim. The claim to be disallowed is substantively duplicative of the surviving and properly asserted claim filed by or transferred to the transferee.									

1998*: Surviving Claim included as the claim to be modified subject to the Debtors- Fifty-Sixth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

54004*: Surviving Claim included as a claim to be modified subject to the Debtors- Fifty-Eighth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims)

88974*: Surviving Claim is pending modification on the Debtors- Thirty-Sixth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)